

**In re Angelos,**  
BUPL No. UPL 91-22 (1992)

Following investigation and report with recommendations by the Office of Disciplinary Counsel, and consideration by the Board, it was held that the admission of non-Delaware lawyers to Delaware courts by a resident firm based outside of Delaware via the pro hac vice procedure did not constitute the unauthorized practice of law, absent abuse of that procedure. The Board conditioned its dismissal of the case upon the disclosure in the firm's telephone directory advertisement that the non-Delaware lawyer who was head of the firm was not admitted to practice in Delaware.